

Certification of CPNI Filing [February 6, 2006]  
EB-06-TC-060  
EB Docket No. 06-36

Town of Pineville d/b/a Pineville Telephone Company  
Certification of Customer Proprietary Network Information Procedures  
**January 1, 2005 thru December 31, 2005**

I certify that I am an officer of the Town of Pineville d/b/a Pineville Telephone Company (“Pineville”) and that I have personal knowledge during the annual period specified above Pineville Telephone Company has had in effect operating procedures adequate to ensure compliance with Federal Communication Commission rules governing the protection of Customer Proprietary Network Information (CPNI).

The attached statement explains how Pineville’s CPNI operating procedures ensure compliance with said rules.

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Gary W. Creech, General Manager	Date

## **TOWN OF PINEVILLE d/b/a PINEVILLE TELEPHONE COMPANY**

### **Explanation of Compliance with Customer Proprietary Network Information Rules**

The Town of Pineville, d/b/a Pineville Telephone Company (“Pineville”) recognizes that it has a duty to protect the confidentiality of proprietary information of other telecommunication carriers, equipment manufacturers and customers (Customer Proprietary Network Information or CPNI).

Pineville has procedures in effect to ensure that:

1. Except where authorized by the Commission’s Part 64 rules, or in the case of valid law enforcement requests, all disclosures or uses of CPNI are approved by the customer. Any request to utilize CPNI without customer approval is referred to the General Manager to determine validity.
2. All disclosures of CPNI for law enforcement and marketing campaigns are listed in a CPNI notebook maintained for this purpose, along with backup documentation. This notebook is maintained by the General Manager. Records include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign.
3. Pineville also maintains records of opt-in and opt-out approvals by customers, including a history of notices to customers. All outbound marketing campaigns are approved by the General Manager.
4. In instances where opt-out mechanisms do not work properly the General Manager is required to notify the FCC within five business days in writing (unless the failure is an anomaly). The notice must be in the form of a letter, and must include the Company’s name, a description of the opt-out mechanism(s) used, the problem(s) experienced, the remedy proposed and when it will be/was implemented, whether the relevant state commission(s) has been notified and whether the Company has taken any action, a copy of the notice provided to customers, and contact information. The procedures require that such notice be submitted even if the Company offers other methods by which consumers may opt-out.
5. All company personnel are required to attend a required training course on CPNI requirements as stated in the FCC’s Small Entity Compliance Guide. [http://www.fcc.gov/ocbo/FCC02\\_214.0df](http://www.fcc.gov/ocbo/FCC02_214.0df). The Company has express disciplinary procedures in place covering violation of CPNI policy.

6. Company CPNI procedures require the General Manager to certify annually that he or she has personal knowledge the company has been in compliance with its CPNI operating procedures and that those procedures are adequate to ensure the Company is in compliance with Federal laws and requirements.

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